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6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8  
9 SECURITIES AND EXCHANGE  
10 COMMISSION,

11 Plaintiff,

12 vs.

13 MATTHEW WADE BEASLEY; BEASLEY  
14 LAW GROUP PC; JEFFREY J. JUDD;  
15 CHRISTOPHER R. HUMPHRIES; J&J  
16 CONSULTING SERVICES INC., an Alaska  
17 Corporation; J&J CONSULTING SERVICE,  
18 INC., a Nevada Corporation; J AND J  
19 PURCHASING LLC; SHANE M. JAGER;  
20 JASON M. JONGEWARD; DENNY  
21 SEYBERT; and ROLAND TANNER;

22 Defendants;

23 THE JUDD IRREVOCABLE TRUST; PAJ  
24 CONSULTING INC; BJ HOLDINGS LLC;  
25 STIRLING CONSULTING, L.L.C.; CJ  
26 INVESTMENTS, LLC; JL2  
27 INVESTMENTS, LLC; ROCKING HORSE  
28 PROPERTIES, LLC; TRIPLE THREAT  
BASKETBALL, LLC; ACAC LLC;  
ANTHONY MICHAEL ALBERTO, JR.;  
and MONTY CREW LLC;

Relief Defendants.

Case No. 2:22-cv-00612

**RESPONSE TO ACCOUNTING**  
**ORDERED PURSUANT TO APRIL 13,**  
**2022 TEMPORARY RESTRAINING**  
**ORDER [ECF NO. 3]**

Pursuant to the accounting ordered in the Court's April 13, 2022, Temporary Restraining Order (hereinafter the "TRO"), at ¶ X, Defendant Denny Seybert (hereinafter "Seybert") responds as follows:

Bank Accounts:

Financial Institution	Name of Account	Owner	Account No.	Open
Wells Fargo	LV Capital LLC,	Denny D Seybert 50% Collyn Simmons	XXXXXX921	1/15/2020
Wells Fargo	Denny D Seybert & Julie Seybert	Denny D Seybert & Julie Seybert	XXXXXX764	4/15/2012
Bank of America	Denny D Seybert	Denny D Seybert	XXXXXX987	3/15/1997
Credit Union 1	Denny D Seybert	Denny D Seybert	UNKNOWN	2/15/1992
Bank of Nevada	Quarter Horse Associates LLC	Denny D Seybert, manager	XXXXXX555	8/15/2005
Chase Bank	C&C Group Holdings LLC	Denny & Julie Seybert	XXXXXX969	12/1/2011
Bank of the West	C&C Group Holdings LLC	Denny & Julie Seybert	XXXXXX938	7/15/2016
US Bank	Denny D Seybert & Julie Seybert	Denny & Julie Seybert	XXXXXX465	7/15/2015
Wells Fargo	Rockinghorse Properties LLC	Denny D Seybert	XXXXXX429	6/15/1997

\*complete bank account numbers will be provided in a supplement hereto, if necessary.

Real and Personal Property:

Asset	Description	Percent Owner	Acquired
4524 Garden Place	Rental property with rental income	100%	11/6/2015
570 Karen Way	Rental Property with rental income	100%	5/26/2016
331 Tungsten St	Rental property with rental income	100%	1/28/2016
338 Tungsten St	Rental property with rental income	100%	2/3/2015
259 W Basic Rd	Rental property with rental income	100%	4/11/2012

1	243 W Basic Rd	Rental property with rental income	100%	11/6/2012
2	1041 N Michael Way #255	Rental property with rental income	100%	8/21/2015
3	2305 W Horizon Ridge Pkwy #3913	Rental property with rental income	100%	9/30/2003
4	251 W Basic Rd	Rental property with rental income	100%	5/13/2011
5	254 W Basic Rd	Rental property with rental income	100%	12/27/2012
6	247 W Basic Rd	Rental property with rental income	100%	5/2/2002
7	1104 Snow Roof Ave	Rental property with rental income	100%	11/10/2005
8	2176 Skyline Heights Ln	Main family residence	100%	12/19/2018
9	12245 Carmel Vista Rd #192, San Diego, CA	Second home, occasionally AIRBNB	100%	4/6/2021
10	1087 W Dixie Lane, Panguitch Lake, UT	Second home, occasional rental	100%	7/6/2018
11	1098 Lake Pointe Dr, Bigfork, MT	Second home, will be occasionally AIRBNB	100%	12/2/2021
12	2017 Tesla	Spouse's vehicle. Located in Henderson NV	100%	12/15/2016
13	2020 Chevy Suburban	Personal Vehicle. Located in Henderson NV	100%	7/25/2020
14	2022 Chevy Silverado Pick Up	Personal Vehicle. Located in Bigfork MT	100%	12/18/2021
15	2016 Tige Ski Boat & trailer	Personal leisure boat in Boulder City NV	100%	1/15/2017
16	2007 Lund Boat & trailer	Personal fishing boat in Panguitch UT	100%	7/15/2020
17	2013 Razor ATV & trailer	Personal leisure ATV in Panguitch UT	100%	6/15/2013

1	Rockinghorse Properties LLC	LLC belonging to Denny Seybert for real estate activities.	100%	6/30/1997
2				
3	C&C Group Holdings LLC	LLC belonging to Denny Seybert and Julie Seybert for family properties.	100%	11/7/2011
4				
5	JER2911 LLC	LLC that owns and operates a real estate brokerage as an on-going business. 26.5% owner. Silent Investor. Ownership as Rockinghorse Trust.	26.50%	6/1/2012
6				
7				
8				
9	Hobbyhorse Associates LLC	LLC that owns and operates a real estate brokerage as an on-going business. 50% owner. Silent Investor. Ownership as Rockinghorse Trust.	50%	10/1/2005
10				
11				
12				
13	Southern Nevada Real Estate Services LLC	LLC that owns Vegas Title. A proposed/inactive escrow company. Ownership as Rockinghorse Trust.	50%	9/15/2018
14				
15				
16				
17	Buckhead Investments 2018 LLC	LLC that is used for real estate deals. Currently one such property. 50% owner thru spouse; Julie Seybert.	50%	9/15/2018
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19				
20				
21	Cavalo Holdings LLC	LLC for the holding and management of commercial office space. 50% owner. Silent owner. Ownership as Rockinghorse Trust.	50%	12/15/2013
22				
23				
24	Quarter Horse Associates LLC	LLC for the holding and management of 160 acres piece of land in Phoenix area, AZ. Approx 18% owner of LLC. Ownership as Rockinghorse Trust.	18%	6/15/2005
25				
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27				
28				

Investigation and compliance with this TRO is ongoing and Seybert reserves the right and shall supplement this Response as more information becomes available.

DATED this 21st day of April, 2022.

By: /s/ Lance A. Maningo  
LANCE A. MANINGO  
Attorney for Defendant SEYBERT

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of MANINGO LAW, and that on the 21st day of April, 2022, I served the foregoing RESPONSE TO ACCOUNTING ORDERED PURSUANT TO APRIL 13, 2022 TEMPORARY RESTRAINING ORDER [ECF NO. 3] via electronic service on the parties as shown below:

TRACY S. COMBS, Esq.  
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/s/ Kelly Valenti  
An Employee of MANINGO LAW